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JAN 11 2006

CLERK U.S. DISTRICT COURT  
ANCHORAGE ALASKA

Telephone: (907) 272-4255  
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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF ALASKA

UNITED STATES OF AMERICA.

Plaintiff,

**vs.**

A05-108 CR (JWS)

CARLOS L. RAINEY,

**Defendant.**

## REPORT OF COUNSEL

Pursuant to the Court's order regarding preparation of a scheduling and planning order, William B. Carey, CJA appointed counsel for Defendant CARLOS LIKEE RAINY submits the following report.

The undersigned is in the process of reviewing the discovery that has been made available by the Government to date. With respect to the topics set out in the Court's order, counsel agrees with the suggestions set out in paragraph 1 and 2 on page 3 of the order.

Counsel does not anticipate problems (at this point) in the acquisition of discovery from the Government. However, there are voluminous tapes and recordings which will probably require the assistance of some administrative case paralegal work in order to make economical use of the time involved in reviewing these materials.

Counsel is hesitant to agree to the utilization of a jointly used investigator.

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The various defendants in this case obviously may not have common interests. Mr. RAINEY is defendant number 1 in this case and it is anticipated that he may need his own investigator. Counsel is in the process of determining whether this will be necessary and will submit any request for such services, to the extent it is determined to be necessary as soon as possible.

Counsel is unaware of any problems (at this point) involving transcripts of audio cassettes or CD's. Counsel is agreeable to the joint preparation of any such transcripts, in the event this becomes necessary.

The creation of a "list-serve" by which defense counsel could make service upon each other electronically is appropriate in this case. Counsel's e-mail address is bcarey@alaska.com, fax number 272-4256.

Counsel suggests a motion date in late March, at the earliest.

Counsel for Mr. RAINEY does not anticipate the need for an interpreter in this case.

Counsel believes that they should be allowed at least 2 months to allow any expert witnesses they intend to rely upon in trial. Counsel is in agreement with the suggestion in paragraph 6 on page 5 with respect to the payment of fees for copying discovery materials.

Counsel otherwise defers to the Court and his colleagues with respect to the remaining aspects of the Court's order.

DATED at Anchorage, Alaska this 11<sup>th</sup> day of January, 2006.

LAW OFFICE OF WILLIAM B. CAREY  
Attorney for Defendant  
CARLOS L. RAINEY

  
William B. Carey

ALASKA BAR NO. 52121801

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11 day of January, 2006, a true and correct copy of  
the foregoing was served on the undersigned.

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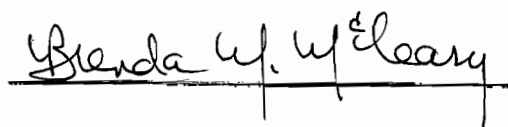
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